

JUDGE DAVID BRIONES

FILED

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF TEXAS

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EL PASO DIVISION

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY *MJ*

**EP 10 CR 1707**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DALLAS BYERS,

Defendant

) NO. EP-10-CR-

) INDICTMENT

) (Vio: Ct 1: 18:2423(b) – Travel with intent  
) to engage in illicit sexual  
) conduct

) Ct 2: 18:2422(a) - Coercion and  
) enticement

) Ct 3: 18:2422(b) - Coercion and  
) enticement

THE GRAND JURY CHARGES:

**COUNT ONE**

**(18 U.S.C. § 2423(b) - Travel With Intent To Engage In Illicit Sexual Activity)**

On or about May 23, 2010, in the Western District of Texas and elsewhere, the defendant,

**DALLAS BYERS,**

a citizen of the United States, did knowingly travel in interstate commerce, that is from the State of New Mexico to the State of Texas, for the purpose of engaging in illicit sexual conduct with another person, all in violation of Title 18, United States Code, Sections 2423(b).

**COUNT TWO**

**(18 U.S.C. §2422(a) - Coercion and Enticement)**

On or about May 20, 2010, in the Western District of Texas and elsewhere, the defendant,

**DALLAS BYERS**

did knowingly attempt to persuade, induce and entice, an individual, to wit: IG, to travel in interstate commerce to engage in sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18 United States Code Section 2422(a).

**COUNT THREE**  
**(18 U.S.C.2422(b) – Coercion and Enticement - Interstate Facility)**

On or about May 20, 2010, in the Western District of Texas, and elsewhere, the defendant,


**DALLAS BYERS,**

did use any facility of interstate and foreign commerce, to knowingly attempt to persuade, induce, entice and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, all in violation of Title 18 United States Code Section 2422(b).

A TRUE BILL.

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FOREPERSON OF THE GRAND JURY

JOHN E. MURPHY  
ACTING UNITED STATES ATTORNEY

BY:   
Assistant United States Attorney